

1 JOHN D. GIFFIN, CASB No. 89608
john.giffin@kyl.com
2 VALERIE I. HOLDER, CASB No. 326667
valerie.holder@kyl.com
3 KEESAL, YOUNG & LOGAN
A Professional Corporation
4 450 Pacific Avenue
San Francisco, California 94133
5 Telephone: (415) 398-6000
Facsimile: (415) 981-0136
6

Attorneys for Specially Appearing Defendants
7 ADVANTAGE SPRING SHIPPING, LLC, ADVANTAGE TANKERS, LLC,
and FLEETSCAPE SPRING LLC
8

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 PSARA ENERGY, LTD.,) Case No. 3:20-cv-04102-WHO
12)
Plaintiff,) **IN ADMIRALTY**
13)
vs.) **RESTRICTED APPEARANCE RULE E(8)**
14)
SPACE SHIPPING LTD., GEDEN HOLDINGS) **SPECIALLY APPEARING DEFENDANTS**
15 LTD.; ADVANTAGE SPRING SHIPPING,) **ADVANTAGE SPRING SHIPPING, LLC,**
16 LLC; GENEL DENIZCILIK NAKLIYATI A.S.) **ADVANTAGE TANKERS, LLC,**
17 A/K/A GEDEN LINES; ADVANTAGE) **AND FLEETSCAPE SPRING LLC'S**
TANKERS, LLC; MEHMET EMIN) **APPLICATION FOR A PROMPT RULE**
18 KARAMEHMET; GULSUN NAZLI) **E(4)(F) HEARING, NOTICE OF MOTION**
KARAMEHMET-WILLIAMS; TUGRUL) **TO VACATE MARITIME ATTACHMENT**
19 TOKGOZ; MEHMET MAT; FLEETSCAPE) **AND RELATED ORDERS**
SPRING, LLC; FLEETSCAPE ADVANTAGE)
20 HOLDINGS, LLC,) Date: June 26, 2020
Time: 10:00 a.m.
21 Defendants.) Place: Courtroom 2, 17th Floor
Judge: Hon. William H Orrick
22

23 TO PLAINTIFF AND ITS ATTORNEY OF RECORD:

24 PLEASE TAKE NOTICE that, Friday, June 26, 2020, at 10:00 a.m., or as soon
25 thereafter as the matter may be heard, the Honorable Judge William H. Orrick will hear Specially
26 Appearing Defendants ADVANTAGE SPRING SHIPPING, LLC, ADVANTAGE TANKERS, LLC,
27 and FLEETSCAPE SPRING LLC ("Advantage Defendants") Application for a Prompt Rule E(4)(f)
Hearing and Motion to Vacate Maritime Attachment and Related Orders.

1 This Application and Motion are based upon this Application and Notice of Motion and
2 Motion, the following Memorandum of Points and Authorities, the Declaration of Marc Matthews,
3 and the exhibits lodged in support thereof which have been served and filed herewith, the pleadings,
4 records and papers on file herein, and on such further oral and documentary evidence as may be
5 presented at the hearing of this Motion.

6
7
8 DATED: June 24, 2020

/s/ John D. Giffin

JOHN D. GIFFIN

VALERIE I. HOLDER

KEESAL, YOUNG & LOGAN

Attorneys for Specially Appearing Defendants

ADVANTAGE SPRING SHIPPING, LLC,

ADVANTAGE TANKERS, LLC,

and FLEETSCAPE SPRING LLC